

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

MAY 29 2003

IN RE ENRON CORPORATION
SECURITIES AND DERIVATIVE &
"ERISA" LITIGATION

§
§ MDL 1446
§

Michael N. Milby, Clerk

MARK NEWBY, et al.,

Plaintiffs,

v.

ENRON CORPORATION, et al.,

Defendants.

§
§
§ CIVIL ACTION NO: H-01-3624
§ AND CONSOLIDATED CASES
§
§
§
§
§

**AGREED MOTION FOR EXTENSION OF TIME TO RESPOND TO
FIRST AMENDED CONSOLIDATED COMPLAINT
FOR CERTAIN OUTSIDE DIRECTORS AND REBECCA MARK-JUSBASCHE**

TO THE HONORABLE MELINDA HARMON:

Lead Plaintiff, certain Outside Directors and Rebecca Mark-Jusbasche ("Mark-Jusbasche") file this agreed motion for an order extending until June 18, 2003, the time for them to answer or otherwise respond to the First Amended Consolidated Complaint filed in this action by Lead Plaintiff on May 14, 2003. In support of their motion, movants¹ respectfully show the Court as follows:

1. Pursuant to Rule 15, Fed.R.Civ.P., defendants have until May 29, 2003 to answer or otherwise respond to the First Amended Consolidated Complaint filed by Lead Plaintiff on May 14, 2003.

¹Outside Directors joining this motion are John A. Urquhart, Paulo V. Ferraz Pereira, Robert A. Belfer, Norman P. Blake, Ronnie C. Chan, John H. Duncan, Joe H. Foy, Wendy L. Gramm, Robert K. Jaedicke, Charles A. LeMaistre, John Mendelsohn, Jerome J. Meyer, Frank Savage, John Wakeham, Charls E. Walker, and Herbert S. Winokur, Jr.

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2. Lead Plaintiff is willing to extend the time for movants to answer or otherwise respond to the First Amended Complaint to June 18, 2003 (this is the same date proposed by Lead Plaintiff for such responses in the Scheduling Order which Lead Plaintiff has submitted to the Court for consideration).

3. Movants believe that the limited requested extension would not delay proceedings and would promote justice and efficiency, and accordingly they request that the Court enter the proposed Order attached to this Agreed Motion.

Respectfully submitted,

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By:



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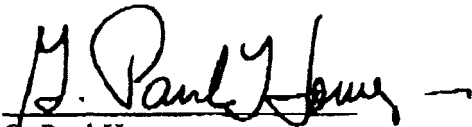
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Agreed Motion has been served by posting a copy on www.ESL3624.com on this the 29th day of May, 2003.

I further certify that a copy of the foregoing Agreed Motion has been served via Certified Mail/Return Receipt Requested on the following parties, who do not accept service by electronic mail on this the 29th day of May, 2003.

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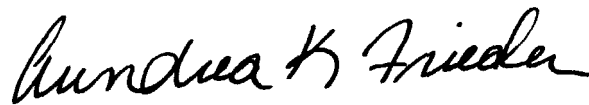
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